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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

VINCENT SANTANA, an individual,

Plaintiff,

VS.

STATE OF NEVADA, ex. rel. NEVADA DEPARTMENT OF CORRECTIONS; DANA MARKS, as an individual; ERIN PARKS, as an individual; SARAH RUSHTON, as an individual; DESIREE HULTENSCHMIDT, as an individual; VALAREE OLIVAS, as an individual; STATE OF NEVADA, ex. rel. NEVADA DEPARTMENT OF CORRECTIONS; STATE OF NEVADA ex. rel. BOARD OF PRISON COMMISSIONERS; JOSEPH LOMBARDO, in his official capacity; AARON FORD, in his official capacity; FRANCISCO AGUILAR, in his official capacity; JAMES DZURENDA, in his official capacity; and JOSEPH BENSON, in his official capacity; and DOES 1-10 inclusive.

Defendants.

Plaintiff Vincent Santana and Defendants State of Nevada ex. rel. Nevada Department of Corrections, et. al., by and through their respective counsel, hereby stipulate and request that this Court grant an extension of time for Plaintiff to file his response to Defendants' Motion to Dismiss (ECF No. 22.) Plaintiff's counsel have continued to deal with family medical emergencies in May and June, 2024. Specifically, Mr. Wolpert's father passed

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1 away on May 17, 2024, requiring Mr. Wolpert and Ms. McLetchie to travel to Tucson, Arizona
 2 to assist with and attend the funeral. Mr. Wolpert was subsequently required to return to Tucson
 3 in June to assist his widowed mother. Furthermore, Ms. McLetchie continues to assist her mother
 4 with treatment for stage IV liver cancer—specifically with recovering from the severe effects of
 5 targeted chemotherapy. The Parties agree that a 14-day extension of time would be appropriate.
 6 This is the second request for an extension of this deadline.

7 This extension is to allow Plaintiff to properly review and respond to the motion to
 8 dismiss and not for the purpose of delay. The parties respectfully request this Court adjust the
 9 deadlines as set forth above—specifically, moving the deadline to respond to the motion to
 10 dismiss from June 28, 2024 to **July 12, 2024**.

11 **IT IS SO STIPULATED.**

12 DATED this 28th day of June, 2024.

13 **MCLETCHE LAW**

14 By: /s/ Leo S. Wolpert
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DATED this 28th day of June, 2024.

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24 **ORDER**

25 **IT IS SO ORDERED**

26 July 1, 2024

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 28 U.S. MAGISTRATE JUDGE